THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS NOTICE OF ONE HUNDRED TWENTIETH OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR IN THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).

IF YOU HAVE QUESTIONS, PLEASE CONTACT DEBTORS' COUNSEL, ERIC KASENETZ, AT (212) 310-8737.

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Robert J. Lemons

Attorneys for Debtors and Debtors in Possession

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

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Debtors. : (Jointly Administered)

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# NOTICE OF HEARING ON DEBTORS' ONE HUNDRED TWENTIETH OMNIBUS OBJECTION TO CLAIMS (NO BLOCKING NUMBER LPS CLAIMS)

PLEASE TAKE NOTICE that on April 15, 2011, Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), filed their one hundred twentieth omnibus objection to claims (the "Debtors' One Hundred Twentieth Omnibus Objection to Claims"), and that a hearing (the "Hearing") to consider the Debtors' One Hundred Twentieth Omnibus Objection to

Claims will be held before the Honorable James M. Peck, United States Bankruptcy Judge, in Courtroom 601 of the United States Bankruptcy Court for the Southern District of New York, One Bowling Green, New York, New York 10004, on **June 2, 2011 at 10:00 a.m.** (**Eastern Time**), or as soon thereafter as counsel may be heard.

PLEASE TAKE FURTHER NOTICE that any responses to the Debtors' One Hundred Twentieth Omnibus Objection to Claims must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of the Bankruptcy Court, and shall be filed with the Bankruptcy Court (a) electronically in accordance with General Order M-399 (which can be found at www.nysb.uscourts.gov) by registered users of the Bankruptcy Court's filing system, and (b) by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect, or any other Windows-based word processing format (with a hard copy delivered directly to Chambers), in accordance with General Order M-182 (which can be found at www.nysb.uscourts.gov), and served in accordance with General Order M-399, and on (i) the chambers of the Honorable James M. Peck, One Bowling Green, New York, New York 10004, Courtroom 601; (ii) attorneys for the Debtors, Weil, Gotshal & Manges LLP, 767 Fifth Avenue, New York, New York 10153 (Attn: Robert Lemons, Esq. and Mark Bernstein, Esq.); (iii) the Office of the United States Trustee for Region 2, 33 Whitehall Street, 21st Floor, New York, New York 10004 (Attn: Tracy Hope Davis, Esq., Elisabetta Gasparini, Esq. and Andrea B. Schwartz, Esq.); and (iv) attorneys for the official committee of unsecured creditors appointed in these cases, Milbank, Tweed, Hadley & McCloy LLP, 1 Chase Manhattan Plaza, New York, New York 10005 (Attn: Dennis F. Dunne, Esq., Dennis O'Donnell, Esq., and Evan Fleck, Esq.); so as to be so filed and received by no later than May 18, 2011 at 4:00 p.m. (prevailing Eastern Time) (the "Response Deadline").

PLEASE TAKE FURTHER NOTICE that if no responses are timely filed and served with respect to the Debtors' One Hundred Twentieth Omnibus Objection to Claims or any claim set forth thereon, the Debtors may, on or after the Response Deadline, submit to the Bankruptcy Court an order substantially in the form of the proposed order annexed to the Debtors' One Hundred Twentieth Omnibus Objection to Claims, which order may be entered with no further notice or opportunity to be heard offered to any party.

Dated: April 15, 2011 New York, New York

/s/ Robert J. Lemons

Robert J. Lemons

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Robert J. Lemons

Attorneys for Debtors and Debtors in Possession

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

-----X

In re : Chapter 11 Case No.

:

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

:

Debtors. : (Jointly Administered)

-----X

## DEBTORS' ONE HUNDRED TWENTIETH OMNIBUS OBJECTION TO CLAIMS (NO BLOCKING NUMBER LPS CLAIMS)

THIS OBJECTION SEEKS TO DISALLOW AND EXPUNGE CERTAIN FILED PROOFS OF CLAIM. PARTIES RECEIVING THIS ONE HUNDRED TWENTIETH OMNIBUS OBJECTION TO CLAIMS SHOULD REVIEW THE OMNIBUS OBJECTION TO SEE IF THEIR NAME(S) AND/OR CLAIM(S) ARE LOCATED IN THE OMNIBUS OBJECTION AND/OR ON THE EXHIBIT ATTACHED THERETO TO DETERMINE WHETHER THIS OBJECTION AFFECTS THEIR CLAIM(S).

IF YOU HAVE QUESTIONS, PLEASE CONTACT DEBTORS' COUNSEL, ERIC KASENETZ, AT (212) 310-8737.

TO THE HONORABLE JAMES M. PECK UNITED STATES BANKRUPTCY JUDGE:

Lehman Brothers Holdings Inc. ("<u>LBHI</u>") and its affiliated debtors, in the abovereferenced chapter 11 cases, as debtors and debtors in possession (collectively, the "<u>Debtors</u>"), respectfully represent:

#### **Relief Requested**

- 1. The Debtors file this one hundred twentieth omnibus objection to claims (the "One Hundred Twentieth Omnibus Objection to Claims"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure (the "Bankruptcy Rules"), and this Court's order approving procedures for the filing of omnibus objections to proofs of claim filed in these chapter 11 cases (the "Procedures Order") [Docket No. 6664], seeking disallowance and expungement of the claims listed on Exhibit A annexed hereto.
- 2. The Debtors have examined the proofs of claim identified on Exhibit A and have determined that the proofs of claim listed thereon (collectively, the "No Blocking Number LPS Claims") violate this Court's July 2, 2009 order setting forth the procedures and deadlines for filing proofs of claim in these chapter 11 cases (the "Bar Date Order") [Docket No. 4271]. Specifically, the No Blocking Number LPS Claims are claims based on a Lehman Program Security (as defined in the Bar Date Order and further below) that do not include an electronic instruction reference number or a blocking reference number as required by the Bar Date Order. The Debtors, therefore, request the disallowance and expungement of the No Blocking Number LPS Claims in their entirety.
- 3. The Debtors reserve all their rights to object on any other basis to any No Blocking Number LPS Claims as to which the Court does not grant the relief requested herein.

#### **Jurisdiction**

4. This Court has jurisdiction to consider this matter pursuant to 28 U.S.C. §§ 157 and 1334. This is a core proceeding pursuant to 28 U.S.C. § 157(b).

## **Background**

- 5. Commencing on September 15, 2008, and periodically thereafter, LBHI and certain of its subsidiaries commenced with this Court voluntary cases under chapter 11 of the Bankruptcy Code. The Debtors' chapter 11 cases have been consolidated for procedural purposes only and are being jointly administered pursuant to Bankruptcy Rule 1015(b). The Debtors are authorized to operate their businesses and manage their properties as debtors in possession pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
- 6. On September 17, 2008, the United States Trustee for Region 2 (the "<u>U.S.</u> <u>Trustee</u>") appointed the statutory committee of unsecured creditors pursuant to section 1102 of the Bankruptcy Code (the "<u>Creditors' Committee</u>").
- 7. On January 19, 2009, the U.S. Trustee appointed Anton R. Valukas as Examiner in the above-captioned chapter 11 cases (the "Examiner") and by order, dated January 20, 2009 [Docket No. 2583], the Court approved the U.S. Trustee's appointment of the Examiner. The Examiner has filed his report pursuant to section 1106(b) of the Bankruptcy Code [Docket No. 7531].
- 8. On January 14, 2010, the Court entered the Procedures Order, which authorizes the Debtors, among other things, to file omnibus objections to no more than 500 claims at a time, on various grounds, including those set forth in Bankruptcy Rule 3007(d) and those additional grounds set forth in the Procedures Order.
- 9. On July 2, 2009, this Court entered the Bar Date Order, which set forth specific alternative claim filing procedures (the "Lehman Programs Securities Procedures") that

"apply to the filing of any and all claims (including claims under a related Guarantee) against the Debtors arising from securities issued by the Debtors or any of the Debtors' affiliates outside of the United States, solely to the extent identified on <a href="http://www.lehman-docket.com">http://www.lehman-docket.com</a> under the heading 'Lehman Programs Securities' (any such security, a 'Lehman Program Security')." (Bar Date Ord. at 12.) The Lehman Programs Securities Procedures resulted from extensive negotiations among the Debtors, the Creditors' Committee, the issuers of Lehman Programs Securities, Euroclear Bank ("Euroclear"), Clearstream Bank ("Clearstream"), and a large group of creditors.

- 10. The Bar Date Order set forth the Lehman Programs Securities Procedures that specifically required, among other things, that claims for Lehman Programs Securities "include either a Euroclear electronic instruction reference number or a Clearstream blocking reference number" (a "Blocking Number") (*Id.* at 13.) Each Blocking Number issued by the applicable clearing agency relates to a specific holder of a specific Lehman Program Security in a specific amount. The issuance of a Blocking Number prevented the holder of a Lehman Program Security from trading that security through November 2, 2009 (the "Securities Programs Bar Date") and is utilized by the Debtors to reconcile such claims.
- 11. The Blocking Number requirement was necessary because the Lehman Programs Securities did not have an indenture trustee that would file a global claim on behalf of all holders of a particular security, but rather individual holders of such securities (or custodians thereof) would be filing claims based on such securities. Accordingly, the blocking number requirement provided the only mechanism for the Debtors to confirm the ownership and amount of a particular security for purposes of the proof of claim based on a Lehman Program Security. Absent the blocking number requirement and temporary restriction on trading, the risk would

exist that the Debtors would make distributions in excess of the outstanding amount of the Lehman Programs Securities and multiple distributions on the same obligation.

- 12. Moreover, the Bar Date Order warned that "any holder of a claim against the Debtors who is required, but fails to file a proof of such claim in accordance with the Bar Date Order . . . shall forever be barred, estopped, and enjoined from asserting such claim against the Debtors (or filing a Proof of Claim with respect thereto)." (Bar Date Order at 9-10.) A copy of the Bar Date Order was made publicly available at http://www.lehman-docket.com.
- around the world, the Lehman Programs Securities Procedures provided that the notice of the Securities Programs Bar Date (the "Securities Programs Bar Date Notice") would be widely published and disseminated. Pursuant to the Bar Date Order, the Securities Programs Bar Date Notice was published by the Debtors in ten languages, plus seven translations for local dialects, in twenty-six newspapers in eighteen countries.<sup>2</sup> The Securities Programs Bar Date Notice was also provided to Euroclear, Clearstream, and similar clearing systems as well as to the issuers of the Lehman Programs Securities with a request that those entities distribute the notice to the holders of Lehman Programs Securities.
- 14. The Securities Programs Bar Date Notice included a "Special Note

  Regarding Blocking Numbers" instructing that "[e]ach Securities Program Proof of Claim must

<sup>&</sup>lt;sup>1</sup> The Bar Date Order also stated that, "other than specifically provided in clauses (a) through (m) above [setting forth the procedures to file claims by holders of a Lehman Program Security], all provisions of this Order apply to holders of claims under any Lehman Program Security and holders of claims based on such Lehman Program Security are required to comply with all provisions of this Order." (Bar Date Order at 15.)

<sup>&</sup>lt;sup>2</sup> The Bar Date Order specified that "the Debtors shall publish notice (translated into the appropriate language, if necessary) substantially in the form of the Securities Programs Bar Date Notice at least once in one leading national newspaper in each of Italy, Spain, France, Germany, The Netherlands (in English), Switzerland, Luxembourg, United Kingdom, Hong Kong, Mexico, Belgium, Austria, Greece, Brazil, Argentina, Australia, and Japan." (Bar Date Order at 14.)

include either a Euroclear Electronic Instruction Reference Number, a Clearstream Blocking Reference Number, or other depository blocking reference number, as appropriate . . . with respect to each Lehman Programs Security for which such Securities Program Proof of Claim is filed." (Secs. Programs Bar Date Notice at 3.)<sup>3</sup> It also warned claimants in bold-face type that "[a]ny holder of a claim based on a Lehman Programs Security who fails to file a Securities Programs Proof of Claim in accordance with the Bar Date Order on or before the Securities Programs Bar Date . . . will be forever barred, estopped, and enjoined from asserting such claim (and from filing a Securities Programs Proof of Claim with respect to such claim) against LBHI [and] the other Debtors and their estates." (*Id.* at 3.)

#### The No Blocking Number LPS Claims Should Be Disallowed and Expunged

maintained by the Court-appointed claims agent, the Debtors have identified the claims on <a href="Exhibit A"><u>Exhibit A</u></a> as being claims based on Lehman Programs Securities that were filed without the required Blocking Numbers. In reviewing claims based on Lehman Programs Securities, the Debtors must reconcile the Blocking Number provided on the proof of claim form with the lists of issued Blocking Numbers provided to the Debtors by the various clearing agencies. Such a reconciliation confirms the ownership of a security by the claimant on the Securities Programs Bar Date. The Debtors, despite their diligent efforts, have been unable to identify a valid Blocking Number issued by a clearing agency for each No Blocking Number LPS Claim. Consequently, the No Blocking Number LPS Claims do not provide any evidence regarding the ownership of such claimed securities and do not comply with the provisions of the Bar Date Order.

<sup>&</sup>lt;sup>3</sup> The Securities Programs Bar Date Notice established October 23, 2009, as the deadline to request a Blocking Number. (Secs. Programs Bar Date Notice at 3.)

- objects." 11 U.S.C. § 502(a). If an objection refuting at least one of the claim's essential allegations is asserted, the claimant has the burden to demonstrate the validity of the claim. *See In re Oneida Ltd.*, 400 B.R. 384, 389 (Bankr. S.D.N.Y. 2009); *In re Adelphia Commc'ns Corp.*, Ch. 11 Case No. 02-41729 (REG), 2007 Bankr. LEXIS 660 at \*15 (Bankr. S.D.N.Y. Feb. 20, 2007); *In re Rockefeller Ctr. Props.*, 272 B.R. 524, 539 (Bankr. S.D.N.Y. 2000).
- 17. The No Blocking Number LPS Claims fail to comply with the specific directions in the Bar Date Order and the Securities Programs Bar Date Notice that each claim based on a Lehman Program Security include a Blocking Number issued by Euroclear, Clearstream or other relevant depository. (See Bar Date Order at 13; Secs. Programs Bar Date Notice at 3.) The Blocking Number requirement in the Lehman Programs Securities Procedures was specifically and extensively negotiated and is a critical safeguard against duplicative or excess distributions on Lehman Programs Securities. Without confirming a valid and unique Blocking Number associated with each and every Lehman Program Security, the Debtors have no way of verifying the ownership and amount of a particular security. The widely distributed Securities Programs Bar Date Notice informed holders of Lehman Programs Securities of the Blocking Number requirement and expressly warned that failure to comply would result in their claims being barred. (See Secs. Programs Bar Date Notice at 3.) Nevertheless, these claimants filed the No Blocking Number LPS Claims without the required blocking number.
- 18. Accordingly, the Debtors request that the Court disallow and expunge in their entirety with prejudice the No Blocking Number LPS Claims listed on Exhibit A.

#### Notice

19. No trustee has been appointed in these chapter 11 cases. The Debtors have served notice of this One Hundred Twentieth Omnibus Objection to Claims on (i) the U.S.

Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange

Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern

District of New York; (vi) each claimant listed on Exhibit A; and (vii) all other parties entitled to

notice in accordance with the procedures set forth in the second amended order entered on June

17, 2010 governing case management and administrative procedures for these cases [Docket No.

9635]. The Debtors submit that no other or further notice need be provided.

20. No previous request for the relief sought herein has been made by the

Debtors to this or any other Court.

WHEREFORE the Debtors respectfully request that the Court grant the relief

requested herein and such other and further relief as is just.

Dated: April 15, 2011

New York, New York

/s/ Robert J. Lemons

Robert J. Lemons

WEIL, GOTSHAL & MANGES LLP

767 Fifth Avenue

New York, New York 10153

Telephone: (212) 310-8000

Facsimile: (212) 310-8007

Attorneys for Debtors

and Debtors in Possession

# **EXHIBIT A**

## 08-13555-mg Doc 16074 Filed 04/15/11 Entered 04/15/11 15:53:31 Main Document Pg 13 of 29 IN RE: LEHMAN BROTHERS HOLDINGS, INC. CASE NO: 08-13555 (JMP)

|   | NAME   | CASE<br>NUMBER    | DEBTOR NAME                      | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED DISALLOWANCE |
|---|--|-------------------|----------------------------------|---------------|---------|------------------------|----------------------------------|
| 1 | ALVAREZ, AGUSTINA TORANO<br>CL ALCALA 70 5-IZ<br>MADRID, 28009<br>SPAIN  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/12/2009    | 1674    | Undetermined           | No Blocking Number LPS Claim     |
| 2 | ANDALUCIA ORIENTAL CASTELLANO MUJER, PRIVATE & BUSINESS CLIENTS - UR VENTURA DEL MAR 1503 CASTELLANO, SPAIN      | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 12/16/2008    | 1356    | Undetermined           | No Blocking Number LPS Claim     |
| 3 | ANDALUCIA ORIENTAL ALEMAN MUJER, PRIVATE & BUSINESS CLIENTS - CL LOS LAGOS 15 3 URB. LA ALQUERIA, BARCELO, SPAIN | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/02/2009    | 1539    | Undetermined           | No Blocking Number LPS Claim     |
| 4 | ANDALUCIA ORIENTAL ALEMAN HOMBRE, PRIVATE & BUSINESS CLIENTS CL LOS LAGOS 15 URB. LA ALQUERIA, BARCELO, SPAIN    | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/02/2009    | 1538    | Undetermined           | No Blocking Number LPS Claim     |

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|   | NAME   | CASE<br>NUMBER    | DEBTOR NAME                      | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED<br>DISALLOWANCE |
|---|--|-------------------|----------------------------------|---------------|---------|------------------------|-------------------------------------|
| 5 | ANDRES HIBERNON GARCIA GORRITA DIAZ, JESUS GARCIA DIAZ, CAYETANO GARCIA-GORRITA DIAZ, SUSANA GARCIA DIAZ, MILAGRO GARCIA- DIAZ, FRANCISCO CRISTOBAL GARCIA DIAZ, PALOMA GARCIA DIAZ, CARMEN GARCIA DIAZ, MARIA DESAMPARADOS GARCIA DIAZ ATTN: CARMEN GARCIA DIAZ VALENCIA, SPAIN | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 06/15/2009    | 4888    | \$191,038.50*          | No Blocking Number LPS Claim        |
| 6 | BADER, ANNEMARIE<br>HOLSTEINER STR. 33<br>DORTMUND, 44145<br>GERMANY   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 10/19/2009    | 41547   | Undetermined           | No Blocking Number LPS Claim        |
| 7 | BALTA SERRET, FERNANDO<br>CL GRABUAC 22<br>BARCELONA, 08793<br>SPAIN   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 02/09/2009    | 2649    | Undetermined           | No Blocking Number LPS Claim        |
| 8 | BARCELONA CASTELLANO HOMBRE, PRIVATE & BUSINESS CLIENTS CL CAMI DEL PINYER 9   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 12/23/2008    | 1435    | Undetermined           | No Blocking Number LPS Claim        |
| 9 | BERGER PASCUAL, MANUEL<br>CL CHILE 36 5-B<br>LOGRO¥O, LA RIOJA, 26005<br>SPAIN   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/02/2009    | 1544    | Undetermined           | No Blocking Number LPS Claim        |

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|    | NAME   | CASE<br>NUMBER    | DEBTOR NAME   | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED<br>DISALLOWANCE |
|----|--|-------------------|---|---------------|---------|------------------------|-------------------------------------|
| 10 | BREDER, BARBARA<br>HUBERTUSHOEHE 6<br>BAD SODEN, 65812<br>GERMANY                    | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.                              | 04/30/2009    | 4031    | Undetermined           | No Blocking Number LPS Claim        |
| 11 | BRETOS, JOSE EUSEBIO PRADO<br>CL DOCTOR FLEMING 21 6-2<br>BARCELONA, 08017<br>SPAIN  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.                              | 01/12/2009    | 1669    | Undetermined           | No Blocking Number LPS Claim        |
| 12 | CAMPOS, MAXIMILIANO HERRERA<br>AV MERIDIANA 329 5-1<br>BARCELONA, 08027<br>SPAIN     |                   | Lehman No Case<br>Asserted/All Cases Asserted                 | 09/04/2009    | 10419   | Undetermined           | No Blocking Number LPS Claim        |
| 13 | CAPILUPPI, SABRINA<br>VIA CHIASSI NO. 13<br>MANTOVA, 46100<br>ITALY                  | 09-10108<br>(JMP) | Luxembourg Residential<br>Properties Loan Finance<br>S.a.r.l. | 09/17/2009    | 15199   | \$29,141.00            | No Blocking Number LPS Claim        |
| 14 | CHICHARRO IZQUIERDO, MARIA I.<br>CL PORTILLO DEL PARDO 28<br>MADRID, 28023<br>SPAIN  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.                              | 01/02/2009    | 1533    | Undetermined           | No Blocking Number LPS Claim        |
| 15 | CHING-NING, LIN TSEN 10/F, NO. 135-2 SONG-REN ROAD TAIPEI, TAIWAN, PROVINCE OF CHINA | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.                              | 08/25/2009    | 9571    | \$100,000.00           | No Blocking Number LPS Claim        |
| 16 | CITY OF BOTANY BAY PO BOX 331 MASCOT NSW 2020 SYDNEY, AUSTRALIA                      | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.                              | 11/17/2008    | 767     | Undetermined           | No Blocking Number LPS Claim        |
| 17 | CLARK, MONICA DIAZ<br>941 ORANGE AVE - 403<br>CORONADO, CA 92118                     | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.                              | 03/11/2009    | 3288    | \$100,000.00           | No Blocking Number LPS Claim        |

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|    |  | CASE              |   | FILED      |         | TOTAL CLAIM  | REASON FOR PROPOSED          |
|----|--|-------------------|---|------------|---------|--------------|------------------------------|
|    | NAME   | NUMBER            | DEBTOR NAME                                   | DATE       | CLAIM # | DOLLARS      | DISALLOWANCE                 |
| 18 | D'LUNA CANTON, JOSE FRANCISCO<br>LILIANA ASCENCIO DE LUNA/<br>VERONICA VANESSA/JACQUELINE/<br>CYNTHIA P. D'LUNA ASCENCIO<br>RAYON #237 COL. OBRERA<br>ENSENADA B.C., 22830<br>MEXICO |                   | Lehman No Case<br>Asserted/All Cases Asserted | 07/29/2009 | 6647    | \$50,000.00  | No Blocking Number LPS Claim |
| 19 | DE GROOT, P.B.<br>P/A MOZARTLAAN 22<br>BILTHOVEN, 3723 JM<br>NETHERLANDS   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 12/08/2009 | 65879   | \$22,760.51  | No Blocking Number LPS Claim |
| 20 | DE KLUIS-DOMISSE, W.<br>BOTERLAARBAAN 34,<br>SCHILDE, 2970<br>BELGIUM  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 05/11/2009 | 4258    | Undetermined | No Blocking Number LPS Claim |
| 21 | EASTERN METROPOLITAN REGIONAL<br>COUNCIL<br>C/- HAYDN ROBINSON<br>1/23 RHEOLA STREET<br>WEST PERTH, WA, 6005   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 12/01/2008 | 1146    | Undetermined | No Blocking Number LPS Claim |
| 22 | ENGUIX ALONSO, CARMEN<br>CL FRANCISCO SUAREZ 9 BL. 4 1-B<br>MADRID, 28036<br>SPAIN   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 01/02/2009 | 1535    | Undetermined | No Blocking Number LPS Claim |
| 23 | FERNANDEZ FERNANDEZ, ARGIMIRO<br>CL SECTOR PINTORES 37 2-B<br>TRES CANTOS, MADRID, 28760<br>SPAIN  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 01/02/2009 | 1530    | Undetermined | No Blocking Number LPS Claim |

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|    | NAME   | CASE<br>NUMBER    | DEBTOR NAME                      | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED<br>DISALLOWANCE |
|----|--|-------------------|----------------------------------|---------------|---------|------------------------|-------------------------------------|
| 24 | FERNANDEZ MORENO, MARIA ISABEL<br>Y<br>FERNANDO BALTA SERRET<br>CL GRABUAC 22<br>BARCELONA, 08793<br>SPAIN | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 02/09/2009    | 2648    | Undetermined           | No Blocking Number LPS Claim        |
| 25 | FILIPPO, DANIELE<br>VIA ROMA 42<br>S GIOVANNI AL NATISONE (UD), 33100<br>ITALY                             | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 09/24/2009    | 34765   | \$28,116.60            | No Blocking Number LPS Claim        |
| 26 | FRANZEK, ERHARD AND URSULA<br>C/O NABER PC<br>300 CENTRAL AVENUE SUITE 320<br>GREAT FALLS, MT 59401        | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 09/16/2009    | 13644   | \$72,323.10            | No Blocking Number LPS Claim        |
| 27 | GARCIA-PUENTE RUIZ, MARIA DE<br>ASIS<br>CL NU¥EZ DE BALBOA 84 6-DC<br>MADRID, 28006<br>SPAIN               | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/02/2009    | 1542    | Undetermined           | No Blocking Number LPS Claim        |
| 28 | GATO SOUTO, PLACIDO<br>CL MESENA 69 3-A<br>MADRID, 28033<br>SPAIN  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/02/2009    | 1534    | Undetermined           | No Blocking Number LPS Claim        |
| 29 | GELDARD, CHRISTINE L.<br>CL CUENCA 23<br>TORRELAMATA<br>ALICANTE, 03188<br>SPAIN                           | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/02/2009    | 1537    | Undetermined           | No Blocking Number LPS Claim        |
| 30 | GOETZ, EBERHARD STEFAN<br>CR MORAIRA-TEULADA 32 BUZON<br>956A<br>RADA MORAIRA, ALICANTE, 03724<br>SPAIN    | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/12/2009    | 1673    | Undetermined           | No Blocking Number LPS Claim        |

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|    | NAME  | CASE<br>NUMBER    | DEBTOR NAME                                   | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED<br>DISALLOWANCE |
|----|---|-------------------|---|---------------|---------|------------------------|-------------------------------------|
| 31 | GOLLMER, DR. RALF<br>RICHARD-DEHMEL-STR. 14<br>DUISBERG, D-47057<br>GERMANY                   |                   | Lehman No Case<br>Asserted/All Cases Asserted | 09/21/2009    | 25520   | Undetermined           | No Blocking Number LPS Claim        |
| 32 | GONZALEZ SOTO, CELIA<br>CL LA MASO 8 3-G<br>MADRID, 28034<br>SPAIN                            | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 01/02/2009    | 1540    | Undetermined           | No Blocking Number LPS Claim        |
| 33 | HEINZEN, HANS<br>C/O NABER PC<br>300 CENTRAL AVENUE SUITE 320<br>GREAT FALLS, MT 59401        | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 09/10/2009    | 11177   | \$10,224.50            | No Blocking Number LPS Claim        |
| 34 | HESSE, LEOPOLD<br>C/O NABER PC<br>300 CENTRAL AVENUE SUITE 320<br>GREAT FALLS, MT 59401       | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 09/16/2009    | 13636   | \$32,616.30            | No Blocking Number LPS Claim        |
| 35 | HUETTELMEYER, KLAUS DIETER<br>DE EICHENDORFFSTRASSE 1<br>WEISSENSTADT, 0-ALEMANIA, 95163      | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 01/12/2009    | 1672    | Undetermined           | No Blocking Number LPS Claim        |
| 36 | INDIAN PACIFIC LTD<br>RICHARD GODFREY<br>P.O. BOX 508<br>SUBIACO, 6904<br>AUSTRALIA           | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 11/05/2008    | 498     | Undetermined           | No Blocking Number LPS Claim        |
| 37 | INGEBORG WYRSCH<br>CHEMIN DU CHAMP 20<br>MARLY/FR, CH 1723<br>SWITZERLAND                     |                   | Lehman No Case<br>Asserted/All Cases Asserted | 11/23/2009    | 65696   | Undetermined           | No Blocking Number LPS Claim        |
| 38 | JAHN, HORST & URSULA<br>C/O NABER PC<br>300 CENTRAL AVENUE SUITE 320<br>GREAT FALLS, MT 59401 | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 09/16/2009    | 13613   | \$14,606.43            | No Blocking Number LPS Claim        |

<sup>\* -</sup> Indicates claim contains unliquidated and/or undetermined amounts

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|    | NAME   | CASE<br>NUMBER    | DEBTOR NAME                      | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED<br>DISALLOWANCE |
|----|--|-------------------|----------------------------------|---------------|---------|------------------------|-------------------------------------|
| 39 | KAPFERER, FRANZ<br>FORCHETSIEDLVNG 7<br>HAIMING, 6425<br>AUSTRIA                     | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 04/07/2009    | 3707    | \$25,619.60            | No Blocking Number LPS Claim        |
| 40 | KOELLEN, DR.ING.OTTMAR<br>HAMMERSTRASSE 9<br>BREMEN, 28199<br>GERMANY                | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 04/23/2009    | 3929    | Undetermined           | No Blocking Number LPS Claim        |
| 41 | KOLL, CHRISTIAN<br>6426 ROPPEN<br>HNR, 125<br>AUSTRIA                                | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 04/07/2009    | 3708    | \$5,393.60             | No Blocking Number LPS Claim        |
| 42 | KT EVENTS INCENTIVOS S.L.U.<br>CL ALEGRE DE DALT 55 4-B<br>BARCELONA, 08024<br>SPAIN | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 04/06/2009    | 3682    | Undetermined           | No Blocking Number LPS Claim        |
| 43 | LAUTENSCHLAGER, ROLF A.<br>SAUERBRUCHSTRASSE 31<br>MUENCHEN, 81377<br>GERMANY        | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 09/24/2009    | 34834   | \$14,500.00            | No Blocking Number LPS Claim        |
| 44 | LEOUSSIS, ANDREW & TSOUYOPOULOS, MARIA FLORA 22, GORGIOU STREET 11636 ATHENS, GREECE | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 12/02/2008    | 1177    | Undetermined           | No Blocking Number LPS Claim        |
| 45 | LEOUSSIS, ANDREW & TSOUYOPOULOS, MARIA FLORA 22, GORGIOU STREET 11636 ATHENS, GREECE | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 12/02/2008    | 1176    | Undetermined           | No Blocking Number LPS Claim        |

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|    | NAME  | CASE<br>NUMBER    | DEBTOR NAME                      | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED<br>DISALLOWANCE |
|----|---|-------------------|----------------------------------|---------------|---------|------------------------|-------------------------------------|
| 46 | S SKOGVEIEN 125B<br>5073 BERGEN   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 09/11/2009    | 11553   | \$30.00                | No Blocking Number LPS Claim        |
| 47 | MAIER, LOTHAR C/O NABER PC 300 CENTRAL AVENUE SUITE 320 GREAT FALLS, MT 59401                                 | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 09/16/2009    | 13626   | \$81,001.88            | No Blocking Number LPS Claim        |
| 48 | MARIA DEL CARMEN BARBERA EJARQUE CL FERNANDO EL CATOLICO 28 4-B 12005 CASTELLON DEL LA PLANA CASTELLON, SPAIN | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 12/16/2008    | 1355    | Undetermined           | No Blocking Number LPS Claim        |
| 49 | MARTINEZ, FRANCISCO JAVIER TORTUERO AV FACULTAD DE VETERINARIA 31 7- D LEON, 24004 SPAIN                      | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/12/2009    | 1676    | Undetermined           | No Blocking Number LPS Claim        |
| 50 | MARTINEZ, JOSE IGNACIO<br>TORTUERO<br>CL PINTORES 20<br>TRES CANTOS, MADRID, 28760<br>SPAIN                   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/12/2009    | 1675    | Undetermined           | No Blocking Number LPS Claim        |
| 51 | MARTINEZ, JOSE JIMENEZ<br>CALLE RIBAS 27 1-3<br>BARCELONA, 08013<br>SPAIN                                     | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 12/23/2008    | 1432    | Undetermined           | No Blocking Number LPS Claim        |

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|    | NAME   | CASE<br>NUMBER    | DEBTOR NAME                      | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED<br>DISALLOWANCE |
|----|--|-------------------|----------------------------------|---------------|---------|------------------------|-------------------------------------|
| 52 | MARTINEZ, SIRA HERRERA<br>CL EDUARD TOLRA 8 BA<br>EL MASNOU, BARCELONA, 08320<br>SPAIN   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/12/2009    | 1670    | Undetermined           | No Blocking Number LPS Claim        |
| 53 | MDA NATIONAL INSURANCE PTY LTD<br>ANDREW FRASER-GILLARD, HEAD OF<br>FINANCE<br>PO BOX 1557<br>SUBIACO, WA, 6008<br>AUSTRALIA                 | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 12/24/2008    | 1442    | Undetermined           | No Blocking Number LPS Claim        |
| 54 | MILIOU, MRS. ZOI/MRS. AMALIA MILIOU/MISS ALEXANDRIA VOVTSINA C/O ALMI MARINE MANAGEMENT S A 87 KIFISSIAS AVENUE MAROUSI ATHENS, 15124 GREECE | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 03/30/2009    | 3563    | Undetermined           | No Blocking Number LPS Claim        |
| 55 | MILLENNIUM MARKETING & MANAGEMENT PTY LTD 80 LANG ROAD CENTENNIAL PARK, NSW AUSTRALIA  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/12/2010    | 66106   | Undetermined           | No Blocking Number LPS Claim        |
| 56 | MORENO BARCO, MARIA TERESA<br>CL SAN ANTON 19 7-B<br>LOGRO¥O, LA RIOJA, 26002<br>SPAIN   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 01/02/2009    | 1543    | Undetermined           | No Blocking Number LPS Claim        |
| 57 | MULLER, BARBARA<br>RANKENWEG 21<br>DORTMUND, 44265<br>GERMANY  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 08/31/2009    | 9988    | Undetermined           | No Blocking Number LPS Claim        |

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|    | NAME  | CASE<br>NUMBER    | DEBTOR NAME                                   | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED<br>DISALLOWANCE |
|----|---|-------------------|---|---------------|---------|------------------------|-------------------------------------|
| 58 | MULLER, KIRSTEN<br>BRANDENIUSSTR. 3<br>DORTMUND, 44265<br>GERMANY   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 08/31/2009    | 9982    | Undetermined           | No Blocking Number LPS Claim        |
| 59 | NEWCASTLE CITY COUNCIL, ""NSW<br>AUSTRALIA""<br>TREASURY ACCOUNTANT - ALISSA<br>JONES<br>PO BOX 489<br>NEWCASTLE NSW, 2300<br>AUSTRALIA | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 11/10/2008    | 566     | Undetermined           | No Blocking Number LPS Claim        |
| 60 | OHTAWARA SHINKIN BANK<br>10-5, CHUO 1-CHOME<br>OHTAWARA-SHI<br>TOCHIGI, 324-0056<br>JAPAN   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 01/12/2009    | 1662    | Undetermined           | No Blocking Number LPS Claim        |
| 61 | OMAHONY, DONAL<br>17 UPPER MOUNT STREET<br>DUBLIN 2,<br>IRELAND   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 10/21/2009    | 43170   | \$1,494,018.05         | No Blocking Number LPS Claim        |
| 62 | OPTIQUE PTY LTD ATF OPTIQUE<br>SUPER<br>PENSION FUND<br>KEITH MASNICK<br>1 ROSLYNDALE AVE<br>WOOLLAHRA, N.S.W., 2025<br>AUSTRALIA       |                   | Lehman No Case<br>Asserted/All Cases Asserted | 07/20/2009    | 5712    | Undetermined           | No Blocking Number LPS Claim        |
| 63 | PAGES, JOSE MARIA SOLA PS DEL PLA 88 08230 MATADEPERA BARCELONA, SPAIN  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 12/23/2008    | 1431    | Undetermined           | No Blocking Number LPS Claim        |

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|    |   | CASE              |   | FILED      |         | TOTAL CLAIM  | REASON FOR PROPOSED          |
|----|---|-------------------|---|------------|---------|--------------|------------------------------|
|    | NAME  | NUMBER            | DEBTOR NAME                                   | DATE       | CLAIM # | DOLLARS      | DISALLOWANCE                 |
| 64 | PARERA RICART, LUIS PLA€A NOVA 5 2-1 TERRASSA BARCELONA, 08221 SPAIN  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 01/02/2009 | 1536    | Undetermined | No Blocking Number LPS Claim |
| 65 | PIETERSEN-PUNT, A. EPICEADREEF 24 KALMTHOUT, 2920 BELGIUM   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 06/12/2009 | 4862    | Undetermined | No Blocking Number LPS Claim |
| 66 | PRANGE GEB THEN, DORIS ANA<br>VL TUSET 26 8<br>BARCELONA, 08006<br>SPAIN  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 03/02/2009 | 3145    | Undetermined | No Blocking Number LPS Claim |
| 67 | PRELL, ELISABETH<br>KRONHUTTENWEG 64<br>KULMBACH, 95326<br>GERMANY  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 11/18/2008 | 790     | Undetermined | No Blocking Number LPS Claim |
| 68 | RANTZSCH, GUNTHER<br>C/O SVEN TINTEMANN<br>UHLANDSTRASSE 173/174<br>ECKE KURFURSTENDAMM<br>10719 BERLIN,<br>GERMANY |                   | Lehman No Case<br>Asserted/All Cases Asserted | 11/02/2009 | 65665   | \$15,314.61* | No Blocking Number LPS Claim |
| 69 | RAPP, ANTONIO LUIS VILLARRUBIA<br>CL CANILLAS 32<br>NOVEDADES VILLARRUBIA<br>MADRID, 28002<br>SPAIN                 | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 12/23/2008 | 1433    | Undetermined | No Blocking Number LPS Claim |

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|    | NAME  | CASE<br>NUMBER    | DEBTOR NAME                                   | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED<br>DISALLOWANCE |
|----|---|-------------------|---|---------------|---------|------------------------|-------------------------------------|
| 70 | REASEGUROS CREDITO Y CAUCION,<br>S.A.U.<br>C/O KEVIN M. ECKHARDT, HUNTON &<br>WILLIAMS LLP<br>1111 BRICKELL AVE., SUITE 2500<br>MIAMI, FL 33131 | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 04/28/2009    | 3999    | Undetermined           | No Blocking Number LPS Claim        |
| 71 | RIBEIRO PIMENTEL, PEDRO MANUEL<br>CORREIA<br>PZ DE BASILEA 2<br>ESC. 1 4-B<br>MADRID, 28028<br>SPAIN  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 01/27/2009    | 2055    | Undetermined           | No Blocking Number LPS Claim        |
| 72 | RIBERA, CARLOS FRANQUES<br>CL BALMES 427 8-A<br>BARCELONA, 08022<br>SPAIN   | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 02/26/2009    | 3086    | Undetermined           | No Blocking Number LPS Claim        |
| 73 | RIESER, URBAN DR<br>C/O VON GRAFFEURIED U PARTNER<br>LIMMATQUAI 94<br>ZURICH, CH-8021<br>SWITZERLAND  | 08-13899<br>(JMP) | Lehman Brothers<br>Derivative Products Inc.   | 10/01/2009    | 35964   | \$49,000.00            | No Blocking Number LPS Claim        |
| 74 | RODRIGUEZ CARNEIRO, ARMANDO<br>RUA FIRMO RIBEIRO 320<br>BARRA DA TIJUCA<br>RIO DE JANEIRO, RJ<br>BRAZIL   |                   | Lehman No Case<br>Asserted/All Cases Asserted | 09/18/2009    | 18064   | \$250,000.00           | No Blocking Number LPS Claim        |
| 75 | RUDOLPH, RALF AND CLAUDIA<br>C/O NABER PC<br>300 CENTRAL AVENUE SUITE 320<br>GREAT FALLS, MT 59401  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 09/16/2009    | 13606   | \$65,728.94            | No Blocking Number LPS Claim        |

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|    | NAME  | CASE<br>NUMBER    | DEBTOR NAME                                   | FILED<br>DATE | CLAIM # | TOTAL CLAIM<br>DOLLARS | REASON FOR PROPOSED<br>DISALLOWANCE |
|----|---|-------------------|---|---------------|---------|------------------------|-------------------------------------|
| 76 | SALCEDO DURAN, GABRIEL<br>CL DIEGO DE LEON 41 7-D<br>MADRID, 28006<br>SPAIN                                 | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 01/02/2009    | 1531    | Undetermined           | No Blocking Number LPS Claim        |
| 77 | SCHULGEN, GREGOR<br>AM LIMPERTZ-HOF 29<br>GREVENBROICH, D-41515<br>GERMANY                                  | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 11/24/2008    | 911     | \$78,000.00            | No Blocking Number LPS Claim        |
| 78 | SERVAT LIGERO, JOSE M<br>CL CASANOVA 0209 2 - 2<br>BARCELONA, 08021<br>SPAIN                                | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 03/16/2009    | 3357    | Undetermined           | No Blocking Number LPS Claim        |
| 79 | TSANG, MAN CHIU<br>FLAT C, 49/F, TOWER 1, ISLAND<br>RESORT<br>28 SIU SAN WAN ROAD<br>CHAI WAN,<br>HONG KONG | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 02/02/2009    | 2506    | Undetermined           | No Blocking Number LPS Claim        |
| 80 | TWIGG, JONATHAN LEYCESTER 50 COOMBE ROAD IRBY WIRRAL, CH61 4US UNITED KINGDOM                               |                   | Lehman No Case<br>Asserted/All Cases Asserted | 09/22/2009    | 31645   | \$33,000.00*           | No Blocking Number LPS Claim        |
| 81 | VAN OTTERLOO, W. DE MOL<br>FRANS DEN HOLLANDERLAAN 29<br>HM GOES, 4461<br>NETHERLANDS                       | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 10/07/2010    | 67120   | \$45,095.58            | No Blocking Number LPS Claim        |
| 82 | VAN OTTERLOO, W. DE MOL<br>FRAN DEN HOLLANDERLAAN 29<br>HM GOES, 4461<br>NETHERLANDS                        | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc.              | 10/07/2010    | 67121   | \$60,836.49            | No Blocking Number LPS Claim        |

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|    | NAME   | CASE              | DEBTOR NAME                      | FILED<br>DATE | CLAIM# | TOTAL CLAIM    | REASON FOR PROPOSED          |
|----|--|-------------------|----------------------------------|---------------|--------|----------------|------------------------------|
| 83 | WERNER, FRIEDHELM AND IRENE C/O NABER PC 300 CENTRAL AVENUE SUITE 320                      | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 09/16/2009    | 13616  | \$21,696.93    | No Blocking Number LPS Claim |
|    | GREAT FALLS, MT 59401  |                   |                                  |               |        |                |                              |
| 84 | WILDEBRAND, NORMA<br>C/O NABER PC<br>300 CENTRAL AVENUE SUITE 320<br>GREAT FALLS, MT 59401 | 08-13555<br>(JMP) | Lehman Brothers Holdings<br>Inc. | 09/16/2009    | 13643  | \$5,785.85     | No Blocking Number LPS Claim |
|    |  | -                 | _                                |               | TOTAL  | \$2,895,848,47 |                              |

# UNITED STATES BANKRUPTCY COURT SOUTHERN DISTRICT OF NEW YORK

-----X

In re : Chapter 11 Case No.

LEHMAN BROTHERS HOLDINGS INC., et al., : 08-13555 (JMP)

:

Debtors. : (Jointly Administered)

-----X

# ORDER GRANTING DEBTORS' ONE HUNDRED TWENTIETH OMNIBUS OBJECTION TO CLAIMS (NO BLOCKING NUMBER LPS CLAIMS)

Upon the one hundred twentieth omnibus objection to claims, dated April 15, 2011 (the "One Hundred Twentieth Omnibus Objection to Claims"), of Lehman Brothers Holdings Inc. and its affiliated debtors in the above-referenced chapter 11 cases, as debtors and debtors in possession (collectively, the "Debtors"), pursuant to section 502(b) of title 11 of the United States Code (the "Bankruptcy Code"), Rule 3007(d) of the Federal Rules of Bankruptcy Procedure, and this Court's order approving procedures for the filing of omnibus objections to proofs of claim [Docket No. 6664] (the "Procedures Order"), seeking disallowance and expungement of the No Blocking Number LPS Claims on the grounds that the Bar Date Order required that such claims include an electronic instruction reference number or a blocking reference number, all as more fully described in the One Hundred Twentieth Omnibus Objection to Claims; and due and proper notice of the One Hundred Twentieth Omnibus Objection to Claims having been provided to (i) the U.S. Trustee; (ii) the attorneys for the Creditors' Committee; (iii) the Securities and Exchange Commission; (iv) the Internal Revenue Service; (v) the United States Attorney for the Southern District of New York; (vi) each claimant listed on Exhibit A attached to the One Hundred Twentieth Omnibus Objection to Claims; and (vii) all

<sup>&</sup>lt;sup>1</sup> Capitalized terms used herein and not otherwise defined herein shall have the meanings ascribed to such terms in the Debtors' One Hundred Twentieth Omnibus Objection to Claims.

other parties entitled to notice in accordance with the procedures set forth in the second amended order entered on June 17, 2010, governing case management and administrative procedures for these cases [Docket No. 9635], and it appearing that no other or further notice need be provided; and the Court having found and determined that the relief sought in the One Hundred Twentieth Omnibus Objection to Claims is in the best interests of the Debtors, their estates, creditors, and all parties in interest and that the legal and factual bases set forth in the One Hundred Twentieth Omnibus Objection to Claims establish just cause for the relief granted herein; and after due deliberation and sufficient cause appearing therefore, it is

ORDERED that the relief requested in the One Hundred Twentieth Omnibus

Objection to Claims is granted to the extent provided herein; and it is further

ORDERED that, pursuant to section 502(b) of the Bankruptcy Code, the claims listed on Exhibit 1 annexed hereto (collectively, the "No Blocking Number LPS Claims") are disallowed and expunged in their entirety with prejudice; and it is further

ORDERED that this Order supersedes all previous orders regarding the No Blocking Number LPS Claims listed on Exhibit 1 annexed hereto; and it is further

ORDERED that this Order has no res judicata, estoppel, or other effect on the validity, allowance, or disallowance of, and all rights to object and defend on any basis are expressly reserved with respect to, any claim listed on <a href="Exhibit A">Exhibit A</a> annexed to the One Hundred Twentieth Omnibus Objection to Claims that is not listed on <a href="Exhibit 1">Exhibit 1</a> annexed hereto; and it is further

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| ORDERED that this C                     | Court shall retain jurisdiction to hear and determine al |
|---|--|
| matters arising from or related to this | Order.   |
| Dated:, 2011<br>New York, New York      |  |
|   | LINITED STATES BANKRUPTCY HIDGE                          |